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## State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

May 5, 2014

Lantz Indergard Lisbon Valley Mining Company PO Box 400 Moab, Utah 84532

Subject: Review of Notice of Intention and Surety, Lisbon Valley Mining, Lisbon Valley Copper Mine,

M0370088, San Juan County, Utah

Dear Mr. Indergard:

Thank you for submitting the reclamation cost estimate received by the Division of Oil, Gas and Mining December 18, 2013. For various reasons Wayne Western and Mike Bradley were not able to effectively review these calculations. The submittal contains an abundance of data, spreadsheets and tables that are at best difficult to digest. It was nearly impossible for them to compare the information in the calculations with the Notice of Intention to Commence Large Mining Operations (NOI) and its amendments because the NOI has been amended several times and is not in a consolidated format. The cost estimate submittal also has some fundamental style problems: several of the spreadsheets are printed in very small font and are very difficult to read, and the maps are also very small and hard to read.

For these reasons, the Division has decided to delay reviewing the reclamation cost estimate until the following items are received.

- An updated NOI. This plan should go beyond just another amendment and should be a clear and concise document that incorporates the changes described in all the amendments that have been approved since the original NOI was approved, and should reflect the current status of the mine relative to the reclamation cost estimates. It needs to serve as a current plan to which the reclamation cost estimate calculations can be compared to ensure that acreages and other figures agree.
- With this updated NOI, the Division requires a current reclamation plan that includes updated maps of the entire facility that fulfill the requirements stipulated in R647-2-105 and R647-2-109.
- Please ensure that the reclamation cost estimate corresponds directly to the reclamation plan, and that the reclamation plan corresponds directly with the operations plan.
- You may include maps showing optional scenarios pending the decisions forthcoming on the Centennial Pit.

Expansion of Dump B was approved on March 18, 2013, and the approval included the following conditions:



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- 1. By October 1, 2013, submit a new, revised Notice of Intention to Commence Large Mining Operations (Notice) which includes the following:
  - a. Maps and plans incorporating all the changes that have been made since the Notice was originally approved.
  - b. A reclamation cost estimate based on the new Notice. The Division will provide forms and technical assistance as needed.
- 2. Also by October 1, 2013, please provide the Division with a set of maps that show when each parcel of land was given either partial or full bond release and detailing the status of reclamation in these areas. These maps should be updated and submitted with the annual report each year.

No later than January 24, 2014, please provide the Division with a progress update for these conditions and request a reasonable and realistic extension of the deadline.

We appreciate and understand the work that has been put into these calculations and the time required to update the NOI. Once the Division receives the updated documents described above, The Division will make every effort to provide a timely review of both the updated NOI and the reclamation cost estimate once these have been received. Please contact Mike Bradley at 801-538-5332 or me at 801-538-5261 if you have questions or need additional information.

Sincerely,

Paul B. Baker

Minerals Program Manager

PBB: mpb: eb

cc: Rebecca Doolittle, Moab BLM (rdoolitt@blm.gov)
Jerry Mansfield, SITLA (jmansfield@utah.gov)

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